

**DESCRIPTION OF PERSONAL DATA FILE**  
**Section 10 of the Personal Data Act (523/1999)**

**Created date: 15.10.2010**

**Updated: 1.6.2012**

<b>Controller:</b>	Evli Alexander Management Oy ("EAM", FI18824913)  Aleksanterinkatu 19 A FI-00100 Helsinki Tel. +358 (0)9 476 690
<b>Person responsible:</b>	Pertti Helaniemi, Managing Director  Aleksanterinkatu 19 A FI-00100 Helsinki Tel. +358 (0)9 4766 9421
<b>Name of file:</b>	Share-based incentive administration solution ("Incentive")
<b>Purpose of file:</b>	Incentive is an on-line solution used to administer the client companies' share-based incentives. With separate agreement, also an Extranet service for option sales tracking provided by Euroclear Finland Ltd ("Euroclear") can be added into Incentive.  The purpose of Incentive is to assist client companies in the administration of their share-based incentives and in carrying out the relating employer obligations as well as to receive and forward client company employees' option and share sale and / or subscription orders.  The file can be used for direct marketing purposes if the persons participating in the client companies' share-based incentives have given their permission.
<b>Data subjects:</b>	Persons who have/had an employment or service contract to EAM's client company and/or are eligible participants in the company's equity incentive plans.
<b>Data contained in the file:</b>	The file contains data on the data subjects including identification data (social security number or date of birth), basic personal data, contact data, and employment data (e.g. employer company, taxation country, reason for termination, salary), book-entry account information (e.g. payroll bank account, ownership data and transactions), information about the Company's share-based incentive and other possible information that is requested by the client company.  For those client companies that use the Euroclear's Extranet service, the file includes information regarding option transactions and ownerships.  For option and share transactions transferred to and executed by Evli Bank Plc, the execution data and price information are received real-time. Also incentive plan related book-entry account and bank account balances are received from Evli.
<b>Regular data sources:</b>	Client companies, as employers, provide basic data regarding their share-based incentives as well as the persons who have/had an employment or service contract to the company. (Data transfer or sftp-connection)  Euroclear's Extranet service.  Evli Bank Plc client register and trading as well as depository system.

<p><b>Regular data disclosures:</b></p>	<p>The taxable benefits are reported (monthly) to the tax authorities and/or client companies in order for them to carry out employer obligations.</p> <p>The option and share sale and / or subscription orders are transferred to Evli Bank Plc for execution.</p>
<p><b>Transfer of data outside the EU or EEA:</b></p>	<p>Data can be transferred outside member states only on the grounds permitted by the Personal Data Act.</p>
<p><b>Personal data file security:</b></p>	<p>Manual data:</p> <p>No manual data of the solution is maintained</p> <p>Data saved in the IT system:</p> <p>The file is protected by outside hosting-service provider and the access and use requires a user name and password, random generated authentication code. For administrators also IP address restriction is used. All data communication is SSL-protected</p> <p>The file is prescribed by law as confidential. Access to the data file is restricted by right of use and right of maintenance. Access control is in all premises where there is unlimited access to the data.</p>